

**FILED**

JUN 08 2022

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY ku, DEPUTY

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

WILLIAM JOSEPH DANIEL,

Defendant.

No.

**CR 22-229 R**

Violations: 18 U.S.C. § 1152  
18 U.S.C. § 13  
21 O.S. § 1123(B)(3)  
21 O.S. § 1111.1(B)  
21 O.S. § 1114(A)(6)

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT 1**  
**(Sexual Battery)**

Between on or about February 1, 2022, and on or about May 12, 2022, in Indian Country, in the Western District of Oklahoma,

----- **WILLIAM JOSEPH DANIEL**, -----

a non-Indian who was over the age of eighteen and was employed by Marlow Public Schools, intentionally touched and felt the body and private parts of a person known to the Grand Jury as Jane Doe, an Indian who was at least sixteen years of age and less than twenty years of age and was a student at Marlow High School during all relevant times, in a lewd and lascivious manner.

All in violation of Title 18, United States Code, Sections 1152 and 13, and Title 21,

Oklahoma Statutes, Section 1123(B)(3), the penalty for which is found in Title 21, Oklahoma Statutes, Section 1123(D).

**COUNT 2**  
**(Rape by Instrumentation)**

Between on or about February 1, 2022, and on or about May 12, 2022, in Indian Country, in the Western District of Oklahoma,

----- **WILLIAM JOSEPH DANIEL**, -----  
a non-Indian who was over the age of eighteen and was employed by Marlow Public Schools, digitally penetrated the vagina of a person known to the Grand Jury as Jane Doe, an Indian who was at least sixteen years of age and less than twenty years of age and was a student at Marlow High School during all relevant times.

All in violation of Title 18, United States Code, Sections 1152 and 13, and Title 21, Oklahoma Statutes, Sections 1111.1(B) and 1114(A)(6), the penalty for which is found in Title 21, Oklahoma Statutes, Section 1115.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER  
United States Attorney

  
TIFFANY NOBLE

Assistant United States Attorney